

Joshua A. Sussberg, P.C.
KIRKLAND & ELLIS LLP
KIRKLAND & ELLIS INTERNATIONAL LLP
601 Lexington Avenue
New York, New York 10022
Telephone: (212) 446-4800
Facsimile: (212) 446-4900

Judson Brown, P.C. (admitted *pro hac vice*)
T.J. McCarrick (admitted *pro hac vice*)
Leah Hamlin (admitted *pro hac vice*)
KIRKLAND & ELLIS LLP
KIRKLAND & ELLIS INTERNATIONAL LLP
1301 Pennsylvania Avenue NW
Washington, D.C. 20004
Telephone: (202) 389-5000
Facsimile: (202) 389-5200

Patrick J. Nash, Jr., P.C. (admitted *pro hac vice*)
Ross M. Kwasteniet, P.C. (admitted *pro hac vice*)
Christopher S. Koenig
Dan Latona (admitted *pro hac vice*)
KIRKLAND & ELLIS LLP
KIRKLAND & ELLIS INTERNATIONAL LLP
300 North LaSalle Street
Chicago, Illinois 60654
Telephone: (312) 862-2000
Facsimile: (312) 862-2200

*Counsel to the Debtors and
Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:)	Chapter 11
)	
CELSIUS NETWORK LLC, <i>et al.</i> , ¹)	Case No. 22-10964 (MG)
)	
Debtors.)	(Jointly Administered)
)	

**PROPOSED JOINT STIPULATION
AND AGREED SCHEDULING ORDER BY AND AMONG THE
DEBTORS, THE OFFICIAL COMMITTEE OF UNSECURED
CREDITORS, AND CORE SCIENTIFIC, INC. WITH RESPECT TO SCHEDULE**

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Celsius Network LLC (2148); Celsius KeyFi LLC (4414); Celsius Lending LLC (8417); Celsius Mining LLC (1387); Celsius Network Inc. (1219); Celsius Network Limited (8554); Celsius Networks Lending LLC (3390); and Celsius US Holding LLC (7956). The location of Debtor Celsius Network LLC's principal place of business and the Debtors' service address in these chapter 11 cases is 121 River Street, PH05, Hoboken, New Jersey 07030.

This stipulation and agreed scheduling order (this “Stipulation and Order”) is entered into by and among the Debtors, the Official Committee of Unsecured Creditors (the “Committee”) and Core Scientific, Inc. (“Core Scientific”).

Recitals

WHEREAS, on September 28, 2022, the Debtors filed the *Debtors’ Motion to Enforce the Automatic Stay and for Civil Contempt* [Docket No. 917] (“Debtors’ Motion”).

WHEREAS, on October 9, 2022, Core Scientific filed a letter on the docket [Docket No. 997] seeking an extension of a hearing on the Debtors’ Motion and indicating Core Scientific may file its own motion for affirmative relief (the “Core Scientific Motion”).

WHEREAS, on October 10, 2022, the Debtors filed a responsive letter on the docket [Docket No. 1003].

WHEREAS, the Debtors, Core Scientific and the Committee (the “Parties”) have met and conferred regarding scheduling for the Debtors’ Motion and the Core Scientific Motion.

WHEREAS, the Parties now jointly submit this Stipulation and Order and respectfully request that the Court approve the schedule set forth below.

IT IS THEREFORE STIPULATED AND AGREED, AND UPON COURT APPROVAL HEREOF, IT IS HEREBY ORDERED THAT:

1. The deadline for the Committee and Core Scientific to file a response or joinder to the Debtors’ Motion is October 19, 2022.
2. The deadline for Core Scientific to file the Core Scientific Motion seeking affirmative relief is October 19, 2022.
3. The deadline for all depositions is November 1, 2022, unless declarations from any new witnesses are added after November 1, in which case such witnesses shall be made available for deposition on or before November 8.

4. The deadline for the Debtors and the Committee to file a reply in support of the Debtors' Motion is November 4, 2022.

5. The deadline for the Debtors and the Committee to file a response to the Core Scientific Motion is November 4, 2022.

6. The deadline for Core Scientific to file a reply in support of the Core Scientific Motion is November 7, 2022.

7. A hearing on both motions will be held at the Court's earliest convenience on or after November 9, 2022. The Parties will seek to be efficient in their presentation of evidence, but at this time they estimate that an evidentiary hearing will take approximately one day.

8. At the hearing, direct testimony will be submitted by declaration, and the declarant will be available for live cross examination. The parties may submit direct testimony declarations from any witness who has been identified and deposed on or before November 8, and the deadline for such declarations will be November 8, 2022. Alternatively, the parties may rely on any declaration submitted in conjunction with their pleadings as the direct testimony for the declarant.

SO STIPULATED:

Dated: October 17, 2022

/s/ Ray C. Schrock

WEIL, GOTSHAL & MANGES LLP

Ray C. Schrock, P.C.

David J. Lender

Ronit J. Berkovich

Theodore E. Tsekerides

767 Fifth Avenue

New York, New York 10153

Telephone: (212) 310-8000

Facsimile: (212) 310-8007

Email: ray.schrock@weil.com

david.lender@weil.com

ronit.berkovich@weil.com

theodore.tsekerides@weil.com

Counsel to Core Scientific, Inc.

/s/ David M. Turetsky

WHITE & CASE LLP

David M. Turetsky

Keith H. Wofford

Samuel P. Hershey

1221 Avenue of the Americas

New York, New York 10020

Telephone: (212) 819-8200

Facsimile: (212) 354-8113

Email: david.turetsky@whitecase.com

kwofford@whitecase.com

sam.hershey@whitecase.com

-and-

Michael C. Andolina (admitted *pro hac vice*)

Gregory F. Pesce (admitted *pro hac vice*)

111 South Wacker Drive, Suite 5100

Chicago, Illinois 60606

Telephone: (312) 881-5400

Facsimile: (312) 881-5450

Email: mandolina@whitecase.com

gregory.pesce@whitecase.com

-and-

/s/ Joshua A. Sussberg

KIRKLAND & ELLIS LLP

KIRKLAND & ELLIS INTERNATIONAL LLP

Joshua A. Sussberg, P.C.

601 Lexington Avenue

New York, New York 10022

Telephone: (212) 446-4800

Facsimile: (212) 446-4900

Email: jsussberg@kirkland.com

-and-

Patrick J. Nash, Jr., P.C. (admitted *pro hac vice*)

Ross M. Kwasteniet, P.C. (admitted *pro hac vice*)

Christopher S. Koenig

Dan Latona (admitted *pro hac vice*)

300 North LaSalle Street

Chicago, Illinois 60654

Telephone: (312) 862-2000

Facsimile: (312) 862-2200

Email: patrick.nash@kirkland.com

ross.kwasteniet@kirkland.com

chris.koenig@kirkland.com

dan.latona@kirkland.com

-and-

Judson Brown, P.C. (admitted *pro hac vice*)

T.J. McCarrick (admitted *pro hac vice*)

Leah Hamlin (admitted *pro hac vice*)

1301 Pennsylvania Avenue NW

Washington, D.C. 20004

Telephone: (202) 389-5000

Facsimile: (202) 389-5200

Email: judson.brown@kirkland.com

tj.mccarrick@kirkland.com

leah.hamlin@kirkland.com

Counsel to the Debtors and Debtors in Possession

Aaron E. Colodny (admitted *pro hac vice*)
555 South Flower Street, Suite 2700
Los Angeles, California 90071
Telephone: (213) 620-7700
Facsimile: (213) 452-2329
Email: aaron.colodny@whitecase.com

*Counsel to the Official Committee of
Unsecured Creditors*

IT IS SO ORDERED.

Dated: _____, 2022
New York, New York

THE HONORABLE MARTIN GLENN
CHIEF UNITED STATES BANKRUPTCY JUDGE